

26470.00D6AW/ema/Doc ID - 674879

Firm No. 412

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NATIVE AMERICAN ARTS, INC.,

Plaintiff,

v.

JEWEL FOOD STORES, INC. a/k/a JEWEL-OSCO
and E. DAVIS INTERNATIONAL, INC.

Defendants.

Jan 6 2005

No. 04C 0277
Judge Hibbler
Magistrate Judge Denlow

NOTICE OF MOTION

TO: Michael P. Mullen, Esq.
Mullen & Foster
166 West Washington Street, #600
Chicago, IL 60602

John T. Gabrielides, Esq.
Brinks Hofer Gilson & Lione
455 North Cityfront Plaza Drive
Chicago, IL 60611-5599

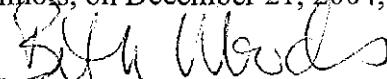
Robert S. Bren, Esq.
Kyoko Imai, Esq.
Oblon, Spivak, McClelland, Maier &
Neustadt, P.C.
1940 Duke Street
Alexandria, VA 22314

You are hereby notified that we will appear in the United States District Courthouse located at 219 South Dearborn Street, Chicago, Illinois, before the following judge or other judge sitting in his/her stead at the place and time specified and present **Defendant Car-Freshner Corporation d/b/a E. Davis International's Motion For Entry Of A Protective Order** a copy of which is attached hereto.

Judge	Room	Date	Time
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Judge William J. Hibbler	1225	Wed., Jan. 5, 2005	9:30 a.m.
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I certify that I filed and served this Notice and the above named document by mailing a copy to each person to whom it is directed at the addresses indicated by depositing it in the U. S. Mail at 20 North Wacker Drive, Chicago, Illinois, on December 21, 2004, with proper postage prepaid.


Beth B. Woods – Attorney at Law

FILED
DEC 21 2004
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT
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U.S. DISTRICT COURT
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Jeffrey H. Lipe (6185734)
Summer E. Heil (6226177)
Beth B. Woods (6278739)
WILLIAMS MONTGOMERY & JOHN LTD.
Attorneys for Defendant Car-Freshner Corporation
d/b/a E. Davis International
20 North Wacker Drive, Suite 2100
Chicago, Illinois 60606
(312) 443-3200

26470.00D6AW/ema/Doc ID - 674308

#412

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

NATIVE AMERICAN ARTS, INC.

Plaintiff,

JEWEL FOOD STORES, INC. a/k/a Jewel-Osco
and E. Davis International, Inc.

Defendants.

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) No. 04 C 0277
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)
) Judge Hibbler
) Magistrate J.

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JAN 06 2005

**DEFENDANT CAR-FRESHNER CORPORATION d/b/a E. DAVIS INTERNATIONAL'S
MOTION FOR ENTRY OF A PROTECTIVE ORDER**

NOW COMES Defendant, CAR-FRESHNER CORPORATION d/b/a E. DAVIS INTERNATIONAL (hereinafter CFC), by and through its attorneys, Jeffrey H. Lipe and Beth B. Woods of WILLIAMS MONTGOMERY & JOHN LTD., and moves this Honorable Court for an Order entering a Protective Order against the unauthorized use or disclosure of confidential information. In support thereof, CFC states as follows:

1. Plaintiff has propounded discovery on CFC and Jewel which seeks certain information that may be confidential, proprietary or involving the personal information of their employees, agents and/or shareholders.

2. In light of the nature of the information which plaintiff is seeking, CFC requests that the court enter the Protective Order attached hereto as Exhibit A in order to ensure that any confidential, proprietary or personal information is adequately protected.

3. CFC has consulted with Jewel and plaintiff on the contents of the Protective Order. Jewel does not have any opposition to the attached Protective Order as drafted. However, plaintiff objects to certain provisions of the Protective Order and refuses to agree to it.

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4. The discovery process and effectively the case is at a completely standstill until the issue of the Protective Order is resolved. As such, CFC prays that the court immediately enter the attached Protective Order.

WHEREFORE, Defendant, CAR-FRESHNER CORPORATION d/b/a E. DAVIS INTERNATIONAL respectfully requests that this Honorable Court enter a Protective Order against the unauthorized use or disclosure of confidential information.

CAR-FRESHNER CORPORATION, d/b/a
E. DAVIS INTERNATIONAL

By: 
Beth B. Woods

Jeffrey H. Lipe
Summer E. Heil
Beth B. Woods
Williams, Montgomery & John, Ltd.
20 North Wacker Drive, Suite 2100
Chicago, IL 60606
(312) 443-3200
Counsel for Car Freshner Corporation, d/b/a
E. Davis International
Firm No. 412

*See Case File
for
Exhibits*